

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**LATOYA HARRIS,**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 3:20-cv-043-GHD-JMV**

**DEFENDANT**

**MEDICAL FINANCIAL SERVICES, INC.**

**PLAINTIFF’S RESPONSE TO DEFENDANT’S MOTION TO DISMISS  
FOR PLAINTIFF’S FAILURE TO PROSECUTE AND ABONDONMENT  
OF SUIT OR IN THE ALTERNATIVE, FOR SANCTIONS OR OTHER  
RELIEF**

NOW COMES the Plaintiff, Latoya Harris, by and through her counsel, LaJuanda Williams-Griffin, and responds to Defendant Medical Financial Services, Inc.’s (“MFSI”) Motion to Dismiss for Plaintiff’s Failure to Prosecute and Abandonment of Suit or in the Alternative, for Sanctions or Other Relief (“Motion”), as follows:

Plaintiff relies upon the Declaration of LaJuanda Williams-Griffin attached as Exhibit 1 and the accompanying memorandum in support of her response.

WHEREFORE, Plaintiff requests this Court to deny MFSI’s Motion in its entirety.

DATED: December 16, 2020

Respectfully submitted,

/s/ LaJuanda Williams-Griffin

LaJuanda Williams-Griffin

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**Proof of Service**

I, LaJuanda Williams-Griffin, hereby certify that on December 16, 2020, I served a copy of the foregoing document upon all parties and counsel as their addresses appear of record via this Court's CM/ECF system.

/s/ LaJuanda Williams-Griffin